

May 17, 1999

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, MD 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

As a food and nutrition professional who works with consumers on food, nutrition, health and safety issues daily, I believe the FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumers have a right to know if the food they choose to consume has been irradiated because it does have a different texture, spoilage characteristics, nutrient composition, and other chemical changes such as radiolytic products.

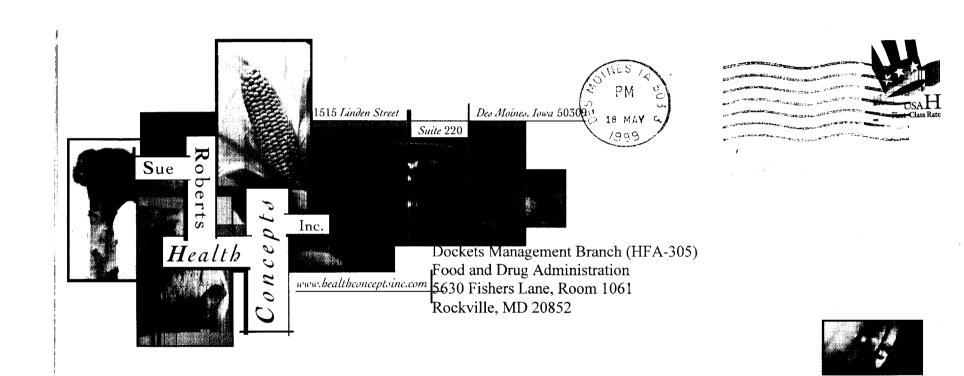
I believe that the label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents of the package. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (containing the term irradiation and the radura symbol).

The public health effects of widespread use of irradiated foods needs to be assessed. As this is being done, each and every consumer has the right to know all the facts about the food they are eating. I believe the FDA labeling requirement for irradiated foods should not be permitted to expire.

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